Seattle, Washington 98121-1128 (206) 624-8300/Fax: (206) 340-9599

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- 5. From my experience as a business owner and executive in other industries, I recognize that the inability to compensate advisors and employees with equity interferes with the Stores' ability to attract and retain the best talent.
- 6. Scott and I have discussed how he would like to transfer his ownership interest in the Stores to me. I am willing and able to assume his ownership interest in the Stores, and I will do so if the LCB will allow it. The Stores are unique to me, and they are the only marijuana businesses in Washington in which I am interested in obtaining an ownership interest. I want to assume Scott's ownership interest in the Stores in part so I can honor him by continuing the businesses and also to give him and the other owners peace of mind that the Stores will be wellcapitalized and in strong, experienced hands, which I can provide.
- 7. I directed my attorney, Chris Masse, to contact the LCB and inquire whether it would approve the transfer of ownership to me. The LCB confirmed it would not approve my ownership because, as a resident of Idaho, I do not meet the LCB's residency requirement.
- 8. I understand that the uncertainty regarding what will happen to the Stores after Scott passes causes him distress, which in turn causes me distress due to our friendship.

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED in Coolin, ID on this 6th day of August, 2020

DocuSigned by:

**Todd Brinkmeyer** 

**DECLARATION OF SERVICE** 

I, Brie Geffre, hereby declare under penalty of perjury under the laws of the United States and of the state of Washington, that on this 6th day of August, 2020, I caused the foregoing to be filed using the CM/ECF system which will send notice of the same to all registered parties

SIGNED at Seattle, Washington this 6th day of August, 2020.

s/Brie Geffre

Brie Geffre, Legal Assistant

DECLARATION OF SERVICE - 3 USDC No. 3:20-cv-05434-MAT